

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,) Criminal No. 3:24-cr-58
)
 Plaintiff,)
)
 v.) **DEFENDANT'S MOTION FOR**
)
MAURICE HAYMON, JR.,) **CONTINUANCE OF TRIAL**
)
)
 Defendant.)

MOTION

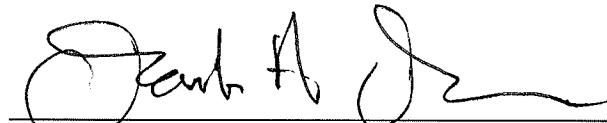
Defendant Maurice Haymon, Jr., moves this Honorable Court for an order continuing the trial date in this case, which is currently set for February 24, 2026, for a four month period for the following reasons:

1. Defendant filed a Motion to Suppress Evidence on June 20, 2025. (Doc. 315.)
An evidentiary hearing was held and post-hearing briefs were filed.
2. On December 19, 2025, Magistrate Judge Senechal filed a Report and Recommendation (Doc. 374) in which she recommended the district court deny Defendant's Suppression Motion.
3. Defendant was allowed to make Objections to the Report and Recommendation.
Those Objections are being filed today.
4. Neither party can adequately prepare for trial until the district court makes a final decision on Defendant's Motion to Suppress. With just over a month remaining until the trial date and with no decision by the district court as of now, counsel for the Defendant is going to need additional time before trial due to trial preparation dependent in large part on the result of the Motion to Suppress.

5. Furthermore, the district court's ruling on the Motion to Suppress affects the parties' negotiations.
6. Defense counsel has conferred with Defendant regarding this Motion for Continuance of Trial, and he has agreed it is in his best interests to continue the trial date for a period of four months.
7. Defendant counsel has also informed Defendant that if this motion is filed, Defendant will have to sign a Waiver of Speedy Trial Rights. Defendant has reviewed and signed such a Waiver, which is being filed with this motion.
8. Defense counsel has conferred via email transmission with Dawn Deitz, the AUSA prosecuting this case, and she has no objection to this motion.

WHEREFORE Defendant moves the Court to continue the trial date herein a period of four months.

Respectfully submitted this 20th day of January, 2026.



Mark A. Meyer
Attorney for Defendant
ND Atty. Reg. No. 04966
205 North 7th Street
P.O. Box 216
Wahpeton, ND 58074-0216
(701) 642-1660
(701) 642-2061 (fax)
markameyer@702com.net